Distributed 10/29/84 FR: D. Stringham TO: B. Constantelos

D. Stringham

R. Bertelt (original)



Minnesota Pollution Control Agency

October 24, 1984

Mr. Basil J. Constantelos Director, Waste Management Division U.S. Environmental Protection Agency Region V 230 South Dearborn Chicago, Illinois 60604

REMEDIAL RESPONSE BRANCH

Dear Mr. Constantelos:

This is in regard to a letter written by Paul Bitter to Stephen Riner of my staff concerning remedial investigation and feasibility study (RI/FS) work at the Reilly Tar site in St. Louis Park, Minnesota. At this time, the State of Minnesota has the lead for all phases of this work under a Cooperative Agreement with the U.S. Environmental Protection Agency (EPA). Mr. Bitter has discussed with Mr. Riner the possibility of EPA taking the lead for a feasibility study which the State is about to undertake, in order to expedite work on this project. In this letter, we would like to acquaint you with the issues involved and propose an alternative to that suggested by Mr. Bitter.

The study in question involves a gradient control system which will be used to prevent ground water contamination from the Reilly Tar site from spreading and affecting further municipal water supply wells. The first phase of the feasibility study on this project has involved ground water flow modeling by the United States Geological Survey which is now essentially complete. feasibility study in question will involve a determination of the most cost-effective means for using and disposing of water from the gradient control well system. We feel that, because local units of government will be involved, this study could prove to be politically sensitive, and for this reason we would prefer that the State take the lead on this study. Furthermore, we have drafted a work plan for this study and we should be in a position to publish a Request for Proposals in the near future.

However, there is another RI/FS project associated with this site which must be performed in the next year and for which the lead could be assumed by EPA. Specifically, we plan a large multi-phase study, including a remedial investigation to determine the extent of contamination in the Drift. Platteville, and St. Peter aquifers, a feasibility study to develop a gradient control-system for these aquifers as needed, and remedial work already authorized by EPA as interim remedial measures to investigate and close or reconstruct multi-aquifer wells. At this time, we have not drawn up a work plan for this

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contract, and we would be willing to allow EPA to use its zone contractor to conduct these studies. If EPA were to take responsibility for this contract, it would free our staff to take more responsibility for technical input into all phases of the RI/FS work and remedial actions at the Reilly site. In addition, it would permit this project to begin earlier than it would if the State were to take the lead.

We have submitted an application for a Cooperative Agreement amendment to fund all anticipated RI/FS work and remedial actions in the next year. If we do agree to allow EPA to take the lead on part of this project, we will have to reamend the Cooperative Agreement to allocate more staff time to other phases of the Reilly project and to turn back contractual funds awarded for the affected study. We would like to discuss this matter with your staff at their earliest convenience. Please contact Stephen Riner at 612/296-7395 to arrange such a discussion.

Sincerely,

Dale L. Wikre

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Director

Solid and Hazardous Waste Division

DLW/SDR:rj

cc: Paul Bitter, U.S. Environmental Protection Agency

Work Assignment Cover Sheet

7630 Little River Turnpike Suite 500 Annandale, VA 22003		
B. Centract Number: 68-01-6		
C. Site Tale:	Reilly Tar, St. Louis Park, Minn.	
D. Assignment Number:		
E. Statement of Work:	Attached	
F. Level of Effort (Work Hours):	Interim Authorization:	
G. Period of Performance:	in SDW	
Region Site Project Officer	Paul Bitter	Phone (312) 886-7571
Regional Project Officer	Richard E. Bartelt, Chief Remedial Response Branch U.S. EPA - Region V 230 South Dearborn Street	Phone (312) 886-7570 (5HR)
Signature	Chicago, Illinois 60604	Date 1/23/22
Contracting Officer	Ulrike A. Joiner U.S. EPA 401 M Street, S.W. Washington, D.C. 20460	Phone 382-3177 (PM 214-F)
Contracting Officer Approval		Dete

CC: Nancy Willis (WH-548E)

Scope of Work for the Remedial Investigation Feasibility Study (RI/FS) for the Reilly Tar Site, St. Louis Park, Minnesota

- I. Using the existing data provided by the sources in I, above, determine the direction of the groundwater flow in the Drift, Platteville and St. Peter Aquifers. An estimate of 10 wells for the purpose of this scope of work is provided. Wells will be drilled at the discretion of the USEPA.

 Cost estimate: (\$12/foot X 150 feet X 10 wells + mobilization) \$40,000.
- II. Compile existing hydraulic and chemical data pertaining to Minnehaha Creek, and determine risk, if any, to aquatic life and/or to humans exposed to the creek. Sources: MPCA; MDH; and Barr Engineering Report, 1981.

 Cost estimate: (4 weeks, 2 people) \$20,000.
- III. Perform a feasibility study (FS) in accordance with the requirements of the National Contingency Plan for treatment of the surface and subsurface contamination. Update costs (already compiled) to meet RCRA required alternatives and relate technological feasibility, social and environmental impacts of each alternative. Sources: Field Investigation Team' report on the Reilly Tar Site, 1981; Barr Engineering Report, 1978; and expert witnesses' reports on health effects of polynuclear aromatic hydrocarbons (PAH). Area of concern is the 80 acre Reilly Tar site and the swamp area south of the site between Highway 7 and Lake Street, the area investigated by GCA in 1981 (data will be provided by USEPA for this task element). Cost estimate: (12 weeks, 2 people) \$67,000.
- IV. FS Report \$5,000 (clerical, printing, and copies)

Total RI/FS cost estimate: \$132,000

Work Assignment Cover Sheet

1941	CH2M Hill Southeast, Inc. 1941 Roland Clarke Place Reston, VA 22091		
B. Contract Number: 68-01	-6692		
C. Site Tale:	Reilly Tar, St. Louis Park,	Minn.	
D. Assignment Number: E. Statement of Work:	Attached		
F. Level of Effort (Work Hours			
G. Period of Performance:	in SDW		
Region Site Project Officer	Paul Bitter	Phone (312) 886-7571	
Regional Project Officer	Richard E. Bartelt, Chief Remedial Response Branch U.S. EPA - Region V 230 South Dearborn Street Chicago, Illinois 60604	Phone (312) 886-7570 (5HR)	
Signature	AS Better	Date 1/23/85	
Contraction But and	James Morant	Phone 382-3184	
Contracting Officer	U.S. EPA 401 M Street, S.W. Washington, D.C. 20460	(PM 214-F)	
Contracting Officer Approval		_ Dote	

Scope of Work for the Remedial Investigation (RI) for the Reilly Tar Site St. Louis Park, Minnesota

- I. Compile all data on the Drift, Platteville, St. Peter aquifers and surface areas. Determine quality of hydraulic and chemical data. Sources: United States Geological Survey (USGS); Minnesota Department of Health (MDH); Minnesota Pollution Control Agency (MPCA); E.A. Hickock and Associates; "Study of Groundwater Contamination in St. Louis Park, MN", 1981; Barr Engineering, "Soil and Groundwater Investigation, Reilly Tar Site," 1978; Monsanto Research Corporation data produced for Reilly Tar and the USEPA soil boring and chemical analysis data produced by the GCA Corporation. Cost estimate (4 weeks, 2 people) \$29,000
- II. Determine what data, if any, are necessary to further define or verify surface and subsurface contamination. Analysis should be limited to phenolics and base-neutral compounds. An estimate of 20 base/neutral and phenolic analyses is provided for this scope of work. Cost estimate: (Sampling 1 person, 10 days) \$5,000 (Analysis of phenolics and base/neutral compounds) \$14,000

III. RI Report \$5,000 (clerical, printing, and copies)

Total RI cost estimate: \$53,000